

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Facilitating the Communications of Earth)	IB Docket No. 18-315
Stations in Motion with Non-Geostationary)	
Orbit Space Stations)	
)	

REPLY COMMENTS OF HUGHES NETWORK SYSTEMS, LLC

Hughes Network Systems, LLC (“Hughes”) hereby submits these reply comments in the above-captioned proceeding in response to comments filed regarding the Federal Communications Commission’s (“Commission”) Notice of Proposed Rulemaking (“NPRM”) to expand the scope of the Commission’s rules to permit Earth Stations in Motion (“ESIMs”) to communicate with non-geostationary orbit (“NGSO”) satellites operating in the fixed-satellite service (“FSS”).¹

Hughes supports the Commission’s proposals to expand its ESIM rules to permit operations with NGSO FSS networks.² With respect to the Commission’s proposal to allow ESIMs to communicate with NGSOs in the 18.8-19.3 GHz (space-to-Earth) and 28.6-29.1 GHz (Earth-to-space) frequency bands, Hughes supports Viasat, Inc.’s proposal that the Commission recognize that “any primary NGSO ESIM operations that may be allowed in the 18.8-19.3 GHz and 28.6-29.1 GHz band segments within the U.S. should not impact GSO operations outside of the U.S., where GSO and NGSO systems are co-primary and are subject to ITU coordination

¹ *Facilitating the Communications of Earth Stations in Motion with Non-Geostationary Orbit Space Stations*, Notice of Proposed Rulemaking, FCC 18-160 (rel. Nov. 16, 2018).

² See Comments of EchoStar Satellite Operating Corporation and Hughes Network Systems, LLC, IB Docket No. 18-315 (Feb. 11, 2019).

requirements.”³ If the Commission decides to permit ESIMs to communicate with NGSO systems in the 18.8-19.3 and 28.6-29.1 GHz band, Hughes requests that the Commission clarify that while GSO operations are secondary to NGSO operations in the U.S. in these bands, the services are co-primary outside the U.S.

Respectfully submitted,

HUGHES NETWORK SYSTEMS, LLC

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³ Comments of Viasat, Inc., IB Docket No. 18-315, at 5 (Feb. 11, 2019).